

**Puerto Rico Solid Waste Management Planning and Program Issues
RA's Talking Points**

- We await the submission of SWMA's draft "Dynamic Programmatic Implementation Plan", or DPIP, in December 2006. However, based upon recent meetings with Puerto Rico municipalities regarding orders to close their landfills, we have heard that funding from the Commonwealth to help the communities complete landfill closure is not anticipated.
- We strongly urge SWMA to include such funding in the draft DPIP if it is not already provided for, since many communities will suffer economic hardship as they implement the DPIP. This funding would be for landfill closure as opposed to funding to construct transfer station and landfill expansions, which the DPIP may already provide for.
- Additionally, although the SWMA is in the process of developing the DPIP for the long-range solid waste management in the Commonwealth, according to the municipalities that have spoken to us, this plan is not being developed in communication nor coordination with the municipalities. Therefore, many municipalities are moving ahead on their own and developing their own solid waste management strategies.
- Over the past several months, through in-person and video conference meetings and in writing, EPA has continually stressed the need for this type of outreach and coordination. I believe it to be imperative, and in everyone's best interest, that SWMA provide outreach to, and coordinate with, the municipalities in developing the final DPIP so that the plan will have every opportunity to be successful.
- Finally, in a letter to honorable Governor Anibal Aceveda Vila dated October 5 of this year, I expressed concern with some of the changes we identified in Puerto Rico's current solid waste management regulations. These include the definition of lateral expansion, the applicability of financial assurance requirements, and the definition of composite liner.
- In that letter I advised the Commonwealth to commence the process to revise these portions of the solid waste management regulations, and to refrain from making any additional changes. I also encouraged the Commonwealth to identify the changes made to its solid waste regulation since the 1993 version, which EPA approved, and transmit this information to us. We did not receive a response.
- At this time we are undertaking our own detailed review of the Commonwealth's regulations. We will be in contact with the Environmental Quality Board when we have completed our review.